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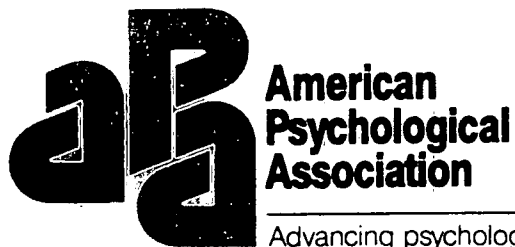
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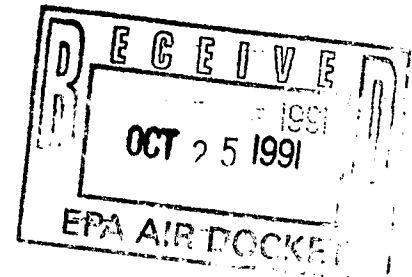
**American
Psychological
Association**

Advancing psychology as a science, a profession, and as a means of promoting human welfare

A-91-46
10/3/91
IV-D-47

Oct. 4, 1991

Mary T. Smith
Director
Field Operations and Support Division (EN-397F)
U.S. Environmental Protection Agency
401 M St. SW
Washington, DC 20460



Re: Docket A-91-46

Fuels and Fuel Additives; Waiver Application

Dear Ms. Smith:

I am writing on behalf of the American Psychological Association (APA), a scientific and professional organization of over 108,000 psychologists, to comment on the Ethyl Corporation's application for waiver under Sec. 211 of the Clean Air Act to allow use of methylcyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

APA has long had an interest in encouraging the EPA to examine and require information on the neurotoxic effects of regulated substances. APA's Division of Psychopharmacology and Drug Abuse has a Neurobehavioral Toxicology Committee that has submitted numerous comments to EPA on behavioral neurotoxicity issues. APA has also testified before Congress on the inadequate requirements for the testing and regulation of neurotoxic substances, most recently in October 1990 before the Senate Committee on Environment and Public Works.

We are very concerned about the Ethyl Corporation's application for a waiver for MMT as a fuel additive because of: its release of manganese into the environment; inadequate information on its pharmacokinetics; and, its neurotoxicity. Too little is known about MMT -- and the release of manganese in such quantities -- to warrant widespread environmental release. There needs to be convincing scientific evidence that MMT will not adversely affect human health before its use as a fuel additive is allowed, and we support the detailed comments submitted by the Environmental Defense Fund on this issue.

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We urge the Administrator to deny Ethyl Corporation's request for a waiver under the Clean Air Act.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lewis P. Lipsitt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lewis P. Lipsitt, Ph.D.
Executive Director of Science

cc: Karen Florini, Environmental Defense Fund
Ellen Silbergeld, Ph.D., Adjunct Senior Toxicologist, EDF
Ronald Wood, Ph.D., President, APA Division of Psychopharmacology and
Drug Abuse